

to the north. A customer living in Seattle has local calling to the eastern and northern suburbs of Seattle.

Under the Commission's proposal, USWC could assign an N11, for instance 211, to one ISP and GTE could assign the same 211 number to a different ISP. If a Seattle customer calls 211, the switching equipment will have no way to determine which ISP/211 number to direct the call to since 211 would be a local call for the customers of both LECs providing service in the EAS area.

In the event that this switching problem could be resolved, the customer confusion problem remains. A customer in Seattle calling 211 would have no certainty as to which ISP it would ultimately reach. The same would be true for the local exchange customers of GTE that share the EAS area with the Seattle customers.

J. It Would Be Imprudent for the Commission to Attempt to Mandate the Availability of "Other Abbreviated Dialing Arrangements"

The Commission asks about the feasibility of requiring that other abbreviated dialing arrangements be made quickly available in lieu of or in addition to requiring the availability of N11 numbers.<sup>30</sup> Legislating technological development is at best problematic. The marketplace must drive technological advances. The Commission should look at other available or soon to be available dialing arrangements as alternatives to N11 number assignment. USWC incorporates by reference here its

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<sup>30</sup>N11 NPRM at ¶ 19.

comments in Section II of this filing, which discusses alternatives to the assignment of N11 numbers for information services.

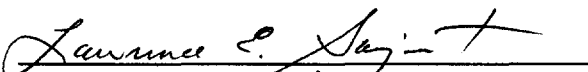
CONCLUSION

On the basis of the foregoing, USWC reiterates its request that N11 numbers be reserved for users that are national in scope and consistent with the public service nature of services that have traditionally been assigned N11 numbers.

Respectfully submitted,

U S WEST Communications, Inc.

By:

  
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June 5, 1992

**ATTACHMENT I**



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June 2, 1992

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Dear Margaret,

The following is in response to the four questions contained in your letter to Ron Conners, dated June 1, 1992:

1. There are currently 139 working area codes.
2. There are 4 area codes scheduled for activation prior to 1995.
3. There are currently 2 pending requests for new area codes. These requests are, of course, based on current projections that can change, either way (+ or -), at least annually.
4. Based on the above numbers, there are request for one more code than exists in the inventory of 144. That need will hopefully be met by the recovery of the 610 NPA code assigned to Canada. The Canadian industry is currently reviewing the offer to swap an N00 code for the 610 code. Absent an agreement on that swap, either an N00 or N11 code will be used as a geographic NPA code. The choice of which is most appropriate will be decided by the industry, via the normal consensus process.

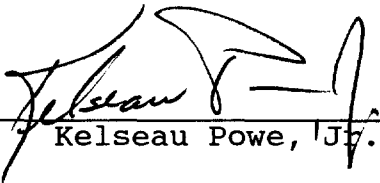
I apologize for the brevity of my answers, it's all that time permits. Should you have any question, please call me on 201-740-4596.

Regards,

Fred Gaechter  
NANP Administration

**CERTIFICATE OF SERVICE**

I, Kelseau Powe, Jr., do hereby certify on this 5th day of June, 1992, that I have caused a copy of the foregoing **COMMENTS OF U S WEST COMMUNICATIONS, INC.** to be hand delivered to the persons named on the attached service list.

  
Kelseau Powe, Jr.

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